

June 1, 2020

VIA ECF

Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 6/2/2020

Re: *Chevrestt v. Barstool Sports*, 1:20-cv-01949 (VEC)

Dear Judge Caproni:

We represent Plaintiff Angel Chevrestt in the above-captioned case. We write in further response to the Court's Order, dated May 8, 2020 which instructed Plaintiff's counsel to "provide the Court with information about the management course he wishes to attend" [Dkt. #10, p. 10]

Attached as Exhibit A please find a screenshot from Lawline.com showing a practice course entitled "*Risk Management Practices for Small Firms & Solo Practitioners*", a 62-minute course taught by Trisha Rich, Colleen H. Burke, Kathleen Clark, and Shannon Nordstrom (the "Management Course"). The Management Course addresses risk management, bar discipline and other issues pertaining to solo practitioners and small law firms.

We respectfully request that the Court enter an Order approving the Management Course as a means to satisfy Plaintiff's counsel's compliance with the Court's order imposing attorney sanctions. [Dkt. #10]

Application DENIED. While training on small firm ethics may be part of the training, it must also be broader to include basic management. The training course must be at least one day long. Mr. Liebowitz must submit another proposed course by **June 8, 2020**.

SO ORDERED.

Respectfully submitted,

s/richardliebowitz/
Richard Liebowitz

Counsel for Plaintiff
Angel Chevrestt

Valerie Caproni

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

6/2/2020

EXHIBIT A



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Risk Management Practices for Small Firms & Solo Practitioners

★★★★★ (1k+ reviews) Produced on August 10, 2017

Taught by Trisha Rich Colleen H. Burke Kathleen Clark

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COURSE INFORMATION

TIME 62 MINUTES DIFFICULTY INTERMEDIATE

CATEGORIES ETHICS LITIGATION

COURSE DESCRIPTION

Risk management issues, including avoiding bar discipline inquiries, are a particularly tricky area for solo practitioners and small firms, who often lack sophisticated internal risk controls. Please join professional responsibility lawyers Colleen Burke (from Collins Einhorn Farrell PC), Kathleen Clark (of Washington University Law in St. Louis), Trisha Rich (from Holland & Knight) and Shannon Nordstrom (from Nordstrom Law Office, PLLC) for a lively panel where they will discuss common ethical pitfalls, including managing data security and metadata, social media responsibility, partnership agreements, identifying and managing conflicts, and properly handling client accounts.

Learning Objectives:

- I. Assess the ethical implications of data security
- II. Understand appropriate social media use for attorneys
- III. Discuss best practices for attorney Partnership Agreements
- IV. Identify and mitigate conflicts of interest
- V. Examine good billing procedures for small firms and solos

CREDIT INFORMATION

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